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13 UNITED STATES DISTRICT COURT

14 NORTHERN DISTRICT OF CALIFORNIA

15 OAKLAND DIVISION

16 UNITED STATES OF AMERICA,) Case No. CR 24-0414-JSW
17 Plaintiff,)
18 v.) GOVERNMENT'S SENTENCING
19 CASEY ROBERT GOONAN,) MEMORANDUM
20 Defendant.)
21) Sentencing Date: September 23, 2025
22) Sentencing Time: 1:00 p.m.
23) Before: The Honorable Jeffrey S. White
24 _____)

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1 “*Loot shops, shoot cops, steal crops.*”

2 *“Not to help it all, but i also continuously find myself ruminating on the single mistake which opened up*
 3 *the door for an FBI investigation and to be identified as a ‘suspect’ on June 1st. If I hadn’t returned to*
 4 *the scene several hours later to take a photo for the communique (which I thought wouldn’t be*
 5 *noticeable because hundreds of people were out walking in the afternoon on UCB campus), then they*
 6 *wouldn’t have had any reason to suspect me at all there was no face and no trace on all 5 actions if*
 7 *that hadn’t happened. If that opening wasn’t made, i’d probably still be on the streets!”*

8 *“One amusing point to mention is that the federal building I attempted to burn down is the very*
 9 *courthouse that my hearings [h]ave been held at.”*

10 “*Death to amerikkka / Glory to the martyrs*”

11 On October 7, 2023, the international terrorist group Hamas, joined by other Palestinian militant
 12 organizations, launched a deadly attack on the state of Israel. The death toll numbered 1200, including
 13 hundreds of civilians. Yet other civilians were kidnapped, and by some accounts, tortured and sexually
 14 assaulted. Hamas termed the operation “al-Aqsa Flood.” Casey Goonan, inspired by this attack, went
 15 on his own reign of terror: Operation Campus Flood. Over the course of several weeks, he firebombed a
 16 police car, attempted to firebomb the Oakland federal building, and set fires on the campus of the
 17 University of California, Berkeley. After each attack, he posted an anonymous online manifesto
 18 explaining that his actions were in furtherance of his political beliefs and calling on others to join him.
 19 And even after being arrested and pleading guilty to his crimes, he has refused to show any remorse and
 20 in fact has taken substantial steps to continue to publicize his actions and recruit others to his cause.

21 The defendant is a highly-educated, unrepentant domestic terrorist who sought to use violence
 22 against law enforcement officers and the federal government. In light of Goonan’s serious criminal
 23 conduct, the motivation for his crimes, his pervasive and deeply held violent beliefs, his utter lack of
 24 remorse for his crimes, and his continuing danger to the community, the Court should impose a sentence
 25 of 188 months in the custody of the Bureau of Prisons, followed by a term of 15 years of supervised
 26 release, restitution of \$94,267.51, and a \$100 special assessment. The Court should also recommend
 27 that the Bureau of Prisons house the defendant in a facility containing a communications management
 28 unit.

1 **I. Procedural History**

2 On June 26, 2024, the defendant was charged by criminal complaint with a violation of 18
 3 U.S.C. § 844(f)(1). Criminal Complaint, ECF No. 1. On July 24, 2024, the grand jury returned an
 4 Indictment charging him with violations of 18 U.S.C. § 844(f)(1), 18 U.S.C. § 844(i), and 26 U.S.C.
 5 § 5861. *See* Indictment, ECF No. 11. On January 14, 2025, the defendant pleaded guilty to Count Two
 6 of the Indictment pursuant to a plea agreement. ECF No. 24. The Court initially set sentencing for
 7 April 8, 2025. *Id.* Thereafter, sentencing was continued to June 10, 2025 (ECF No. 27), July 1, 2025
 8 (ECF No. 28), July 22, 2025 (ECF No. 30), and then to the current date, September 23, 2025 (ECF No.
 9 32).

10 **II. The Sentencing Guidelines**

11 The parties and the probation officer agree that the applicable Guidelines are as follows.
 12 Because Goonan's arsons involved "a state or government facility,"—a UC police vehicle and a federal
 13 government building—a base offense level of 24 applies. *See* PSR ¶ 38. Because Goonan's offense
 14 involved and was intended to promote a federal crime of terrorism, 12 points are added. *Id.* ¶ 40. He
 15 receives a two-level reduction for acceptance of responsibility, and the government hereby moves for a
 16 further one-level reduction because Goonan has timely notified authorities of his intention to plead
 17 guilty.¹ *See id.* ¶¶ 45–46. That leaves him with an adjusted offense level of 33. *Id.* ¶ 47. "[T]hrough the
 18 terrorism enhancement Congress wanted to impose a harsher punishment on any individual who
 19 committed an offense that involved or intended to promote one of the enumerated terrorist acts, and
 20 intended, through that offense, to influence the conduct of others." *United States v. Tankersley*, 537
 21 F.3d 1100, 1113 (9th Cir. 2008). Accordingly, because Goonan has been convicted of an offense
 22 involving a federal crime of terrorism, under the Guidelines, his criminal history category is VI. PSR
 23 ¶ 53. That would ordinarily lead to an advisory Guidelines range of 235 to 293 months, but because the
 24
 25
 26

27 ¹ As described in more detail below and in the PSR, *see, e.g.*, PSR ¶ 36 & sent. rec., Goonan
 28 does not have remorse for his criminal conduct. But remorse is not the same as acceptance of
 responsibility. Here, the defendant truthfully admitted his criminal conduct and entered a guilty plea
 before trial. That is sufficient for acceptance of responsibility under the Guidelines. *See* U.S.S.G.
 § 3E1.1 & nn. 1, 3.

1 statutory maximum sentence for the crime of conviction is 240 months, Goonan's adjusted Guidelines
 2 range is 235 to 240 months. PSR ¶ 94.

3 **III. The Nature and Circumstances of the Offense**

4 **A. June 1, 2024 Firebombing of UCPD Vehicle**

5 On June 1, 2024, the defendant—wearing a mask to cover his face and wearing dark clothing—
 6 approached a marked University of California Police Department (UCPD) vehicle parked on the edge of
 7 the Berkeley campus. He placed six Molotov cocktails directly under the car's fuel tank, ignited them,
 8 and quickly fled. *See Aff. of Tiffany Speirs in Supp. of Crim. Complaint ("Complaint") ¶ 19, ECF No.*
 9 1; PSR ¶ 8. The patrol car caught fire. Complaint ¶ 18; PSR ¶ 7; Declaration of Nikhil Bhagat ("Bhagat
 10 Decl."), Ex. A (video of attack). A witness saw the flames and ran into the station to alert officers about
 11 the attack leading UCPD officers to rush out of the station and extinguish the fire. *Id.* The firebombing
 12 engulfed the vehicle's rear seats, trunk, and fuel port. PSR ¶ 7. Hours later, Goonan returned to the
 13 scene of the crime and took a picture of the destroyed vehicle. *See Complaint ¶ 21.*

14 The following day, Goonan made an anonymous Internet post about the attack, including the
 15 picture of the damaged vehicle. Goonan took responsibility for the act, expressing that it was
 16 intentionally "placed between the tire and underside of the fuel tank," and contended that the Molotov
 17 cocktail device "ha[d] enough fuel in it to torch the entire car if it was successfully placed." PSR ¶ 9.
 18 The post then began to list a long series of grievances, including a complaint about the police response
 19 to protests at another University of California campus, and expressing solidarity with those who faced
 20 what Goonan termed "genocidal state violence here in the Bay Area." The post closed, "Death to
 21 amerikkka / Glory to the martyrs." *See id.*

22 **B. June 11 Attempt to Firebomb the Interior of the Oakland Federal Building**

23 On June 10, 2024, activists set up tents on the premises of the Philip Burton Federal Building
 24 and U.S. Courthouse in San Francisco, blocking the public entrance to the building along Golden Gate
 25 Avenue. After they failed to heed lawful commands to disperse, Federal Protective Services officers
 26 took action to clear them from the premises. *See generally Joe Kukura, Pro-Palestine Protesters Set Up*
27 Encampment Outside SF Federal Building, But Police Clear it Quickly, SFist, available at

1 https://sfist.com/2024/06/11/pro-palestine-protesters-set-up-encampment-outside-sf-federal-building-
2 but-police-clear-it-quickly/ (Jun. 11, 2024).

3 On June 11, 2024, Goonan arrived at the 12th Street entrance to the Oakland Federal building.
4 He was carrying a bag containing three Molotov cocktails. He arrived at the building aiming to break a
5 window and throw lit Molotov cocktails into an office in the interior of the building. Plea Agmt. 3:23–
6 3:24; PSR ¶ 13. The office belonged to the United States Railroad Retirement Board. Plea Agmt. 3:27 –
7 4:1. Although ultimately unsuccessful in his quest, Goonan caused thousands of dollars in damage to the
8 building:



24
25 While trying to break the window so he could toss the lit Molotov cocktails inside, Goonan was
26 interrupted by an on-duty protective services officer (PSO) and an off-duty PSO. Plea Agmt. at 3:24–
27 3:25. As Goonan absconded from the officers, he dropped the bag containing the Molotov cocktails into
28 a planter that abuts the building, lit it on fire, and fled. See PSR ¶ 12.

1 Within hours, Goonan posted about this attack, too. He took credit for smashing windows and
 2 lighting a firebomb at the Oakland federal building, saying that it was in retaliation for the clearing of
 3 the encampment at 450 Golden Gate the day before. PSR ¶ 13. Goonan called himself an “insurgent,”
 4 and noted that although he was “unsure if the firebomb caught hold of the [federal] building front
 5 [w]hen the pigs mess with our people we must retaliate to level the score. *Redirect the violence back at*
 6 *the rulers and managers of the global Settler empire.*” *Id.* (emphasis added).

7 **C. June 13 and June 16 Arsons on the UC Berkeley Campus**

8 In the early morning hours of June 13, 2024, Goonan lit a fire near Koshland Hall on the UC
 9 Berkeley campus. Plea Agmt. at 4:13–4:14. Consistent with past practice, shortly thereafter he again
 10 took credit for the arson in an online post titled “UCLA Students Were Attacked Last Night So We
 11 Retaliated With a Firebomb on UCB Campus.” PSR ¶ 15. Apparently upset with the actions of campus
 12 police at UCLA, he “retaliated with a firebomb on UCB campus.” He wasn’t sure what building he hit,
 13 and he didn’t care: in Goonan’s view, “every single building on the UC Berkeley Campus deserves to be
 14 incinerated following the UC System’s treatment of student protestors [sic].” The post concluded with a
 15 threat: “UC SYSTEM MUST DIVEST FROM ISRAEL OR FACE OUR WRATH OF REVENGE.
 16 BLESSED IS THE FLAME.” See Plea Agmt. at 4:16–4:18; PSR ¶¶ 15, 16.

17 On June 16, 2024, in the middle of the afternoon, Goonan returned to the UC Berkeley campus
 18 and lit fire to a construction site. PSR ¶ 17. This attack showed a new level of sophistication; in
 19 addition to wearing a mask and gloves, like in other attacks, surveillance cameras show that he changed
 20 clothes during the attack. See Bhagat Decl. Ex. B at 3–4 (FBI analysis describing relevance of evidence
 21 found to June 16 attacks). When the FBI and other law enforcement agencies searched Goonan’s room,
 22 they located planning documents that closely matched Goonan’s ingress and egress to the campus during
 23 the June 16 fire. See Bhagat Decl. Ex. C.

24 Within hours, Goonan posted about the June 16 attack, this time recapping what he called
 25 “Operation Campus Flood,” and setting forth his myriad reasons: (1) retaliation against the UC Police
 26 Department for its “attacks” on students at the Santa Cruz and Los Angeles campuses; (2) an effort to
 27 create destruction until the University of California system divested from Israel; (3) solidarity with those
 28 who were displaced from Berkeley’s People’s Park; (4) retaliation for the University of California,

1 Berkeley administration's "stealing the land called people's park"; and (5) for fathers who had lost
 2 children. *See* PSR ¶ 18. The post ended with the date and "1312," which is code for "all cops are
 3 bastards." *Id.* *See also* PSR ¶ 24 (describing meaning of 1312). Both the June 13 and June 16 arsons
 4 were part of Goonan's call to others to attack Bay Area college campuses. PSR ¶ 19.

5 Goonan called the June 2024 series of attacks "Operation Campus Flood," after "Operation al-
 6 Aqsa Flood," Hamas's name for its October 7, 2023 attack on Israel, in which it killed approximately
 7 1,200 people and took 240 citizens hostage. *See* PSR ¶ 19; Ord. Granting Mot. to Dismiss & Denying
 8 Mot. for Prelim. Inj. at 1, *Defense for Children Int'l-Palestine v. Biden*, No. 23-cv-5829 (N.D. Cal. Jan.
 9 31, 2024).

10 **D. Other Evidence Relating to the Defendant's Premeditation and Planning**

11 The day after the June 16 arson, state and federal law enforcement officers executed search
 12 warrants on Goonan's residences in Oakland and Pleasant Hill. In his room at his parents' house, they
 13 found, inter alia, a 24-page pamphlet that the defendant had created, seeking to spread his propaganda to
 14 others and teach them how to commit crimes without detection. *See* Bhagat Decl. Ex. D (pamphlet);
 15 Plea Agmt. at 5:3–5:4 (admitting authorship). Among other things, the pamphlet advocated that there
 16 was "only one response" to the United States government—to "burn its policing and military
 17 infrastructure and institutional bases of violence/dominance/power to the ground." *Id.* at USA-002849.
 18 It also provided detailed instructions to all who would seek to follow in Goonan's footsteps and
 19 participate in his "Operation Campus Flood" to take care to avoid being captured on surveillance
 20 cameras, to cover their faces, avoid leaving DNA, and avoid being tracked by their cell phone. *Id.* at
 21 USA-002850–USA-002851. The pamphlet also declared: "Gasoline, glass bottles, burned oil and rags
 22 are easily acquired. Also other materials with which one can attack the system and its cops can easily be
 23 found. *Id.* at USA-002851. For us, *all means that are in accordance with the ends are weapons that*
 24 *can be directed against power. Maybe some are more destructive than others, but no any means gets*
 25 *ideological overrating over another.*" *Id.* (emphasis added). Goonan also reproduced another internet
 26 post that he authored, describing his true intentions for Operation Campus Flood: disappointed with the
 27 results of peaceful protest, he declared, "All you need is three people and some hammers and ATTACK
 28 THE GLASS." *Id.* at USA-002859. *See also* Plea Agmt. 5:4–5:7 (admitting authorship). Alternatively,

1 Goonan suggested, “There are also other options, much more stealth, quiet, and cost effective for us (and
 2 massively debilitating to them). For example, we could simply TORCH the buildings and artificial
 3 landscapes that colonize the land these universities occupy.” Bhagat Decl. Ex. D at USA-002858. The
 4 essay ended with the following rhetorical question: “Or, if taking space gets us arrested in nearly every
 5 new encampment or demo[nstration] (exposing us to massive state surveillance and network mapping)
 6 then is a *direct attack* at the point of production on these campuses not the only viable option that
 7 remains?” *Id.* at USA-002859 (emphasis added). “These actions, if multiplied and done en masse can
 8 create a decisive rupture condition, which has the potential to force the divestment of Bay Area college
 9 systems from ties to not only Israel the settler state, but ties with U.S. weapons manufacturers involved
 10 in militarization across the world. And if they refuse, we should simply burn their shit down.” *Id.* at
 11 USA-002855. Goonan included a picture of the burned police car that he destroyed on June 1. *Id.* at
 12 USA-002857. Goonan expressed his anger not only at universities and the government, but at those who
 13 shared his beliefs but who sought to remain peaceful:

14 *We need to defend revolt instead of letting liberals who hate uprisings demonize militant protest.*
 15 Resisters instead should experiment with group-based and lone-wolf attacks on the key
 16 infrastructure (buildings, mainframes, technology) of the Universities and their built landscape.
 Trees, bushes, and dried grass makes quiet and quick attacks easy.

17 *Id.* at USA-002855 (emphasis added).

18 In Goonan’s room, agents found ample evidence of his disregard for the law. One sticker read
 19 “Fuck shit up, don’t get caught.” Bhagat Decl. Ex. E at USA-003027. Another, “Do what’s right not
 20 what’s legal.” *Id.* at USA-003036. A printout dated March 27, 2024 argued that individuals should slash
 21 the tires of security vans because security guards are “auxiliary of the prison and police state,” and
 22 should set fire to prisons. *Id.* at USA-003048. Agents found a pencil drawing depicting a grenade and a
 23 Molotov cocktail, surrounded by the words “Anarchy Studies” “FTP”. *See id.* at USA-003089. Goonan
 24 also possessed a color pamphlet that was produced by Hamas entitled “Our Narrative...Operation Al-
 25 Aqsa Flood,” a well-known propaganda piece that set forth Hamas’s justifications for its violent attack
 26 on civilians in October 2023. *Id.* at USA-0003184. A posterboard in Goonan’s room contained printouts
 27 tilted “The Simplest Way to Burn a Vehicle,” and “Minimizing DNA Traces During Riotous Moments.”
 28 *Id.* at USA-000968.

1 Finally, agents found two maps in Goonan's room depicting his arson plans and depicting the
 2 Berkeley campus and surrounding areas. *See* Bhagat Decl. Ex. C.

3 **IV. Defendant's History and Characteristics**

4 **A. Defendant's Personal Characteristics**

5 The defendant is 35 years old and was 34 at the time of his crimes. PSR at 2. His frontal lobe is
 6 fully developed. He holds a Ph.D. from Northwestern University. PSR ¶ 82. He some health issues, *see*
 7 PSR ¶¶ 68–77, but none of them can explain his criminal conduct. In stark contrast to many defendants
 8 who come before the Court, he has never been addicted to drugs, PSR ¶¶ 79 –81, and was raised in a
 9 "loving environment" by both parents. PSR ¶ 60–61.

10 **B. Defendant's Communications While in Pretrial Detention**

11 While in pretrial detention at the Santa Rita Jail, the defendant has engaged in voluminous
 12 correspondence with several apparently like-minded individuals. The correspondence is too voluminous
 13 to describe in detail here, but in general, it evinces a person who shows no remorse for his actions, seeks
 14 to aggrandize himself, and seeks the assistance of others in spreading his message of political violence.
 15 *See* Bhagat Decl. Ex. F (summary of certain correspondence).

16 **1. *Self-Aggrandizement and Promotion of Political Violence***

17 The defendant's jail correspondence paints a picture of a narcissistic violent ideologue. Goonan
 18 refers to himself, proudly, as "[t]he only federal prisoner of the campus insurgencies in the entire
 19 country." Bhagat Decl. Ex. G at USA-0007628. He admits to using his medical condition as a weapon,
 20 bragging that he engaged in a hunger strike at Santa Rita and that his body was "a potentially dangerous
 21 (in the good way) weapon as a hunger striker." Bhagat Decl. Ex. H at USA-007504. Following his
 22 arrest, Goonan told a friend that he hoped that the prison movement and the student movement took up
 23 the most creative militant tactics possible. Bhagat Decl. Ex. F. at USA-008208. "No more of this
 24 pacifist transformative justice/community bullshit. People are not learning enough from October 7th +
 25 Palestine resistance tactics. People/students/anarchists in the Bay [*i.e.* Goonan himself] were testing
 26 these methods @ UC Berkeley . . . Like the red triangle dot gopro videos of Pali resistance fighter
 27 marking settler tanks in sneak attacks." *Id.*

1 After reading a local news story about his prosecution, Goonan, who holds a liberal arts Ph.D.,
 2 was annoyed and insulted that the newspaper called him an “academic:” “Anyway, I find it both
 3 annoying and insulting to be reductively characterized as an “academic” for several reasons that are
 4 worth detailing below.” Bhagat Decl. Ex. I at USA-0007261. Goonan then spent 13 pages,
 5 paradoxically in an academic style, explaining that he was not an academic, but a “revolutionary
 6 abolitionist” who, for nearly a decade, had practiced “militant opposition.” *See id.* at USA-007271.

7 In January 2025, Goonan wrote a friend, upset that an activist group wasn’t appropriately
 8 recognizing him and his actions. He explained that the group had been compiling and publishing a list of
 9 all known arrestees from pro-Palestinian demonstrations, and that he had simply written them to explain
 10 that they had missed him and that he was “the only federal prisoner and facing the most severe charges
 11 of anyone on their lists.” *See* Bhagat Decl. Ex. J at USA-007597. “These pacifists,” Goonan lamented,
 12 “could not understand how my acts were ‘anti-war.’” *Id.* He complained that “this pacifism”—that is,
 13 peaceful protest—was “affecting the Palestine movement” and was an “obstacle impeding a
 14 revolutionary horizon.” *Id.*

15 In the days leading up to his change of plea hearing, Goonan authored a poem about the hearing,
 16 sent it to several people and asked at least two of them to publish it. *See* PSR ¶ 24; Bhagat Decl. Ex F.
 17 at USA-008209. That poem attempted to justify his criminal actions and called upon others to join him:
 18 “In retaliation, I have set fires. As invitation I ask will you join? Or will patience persist as the
 19 unmerited virtue of today.” *Id.*

20 Goonan finds it “amusing” that “the federal building I attempted to burn down is the very
 21 courthouse that my hearings [h]ave been held at.” Bhagat Decl. Ex. N at USA-008059. On January 15,
 22 2025—the day after he pleaded guilty before this Court—Goonan mailed a drawing to an organization
 23 in Chicago. The drawing depicts a burning American flag, a dark hand holding a Molotov cocktail with
 24 “1312,” (“all cops are bastards”) a UC Police Department vehicle alight and an Israeli Defense Forces
 25 tank, and the label “Anticolonial Direct Action,” along with inverted red triangle—a universal symbol of
 26 Hamas. On the reverse, Goonan wrote “FTP” – “Fuck the police.” *See* Bhagat Decl. Ex. K at USA-
 27 007679–USA-007680; PSR ¶ 24. In a November 2024 letter, he included a drawing of a UCPD car on
 28

1 fire, writing, “fire to the jails and prisons” and signing off, “Love, Casey.” Bhagat Decl. Ex. L at USA-
 2 007522.

3 Goonan views himself—a person who takes violent action against institutions he sees as
 4 hindering his political goals—as a doer, not a bystander, and criticizes news articles that “only uplift
 5 pacifist [read: peaceful] forms of struggle,” to achieve political goals, suggesting that he desires the
 6 opposite: violent forms of struggle. *See* Bhagat Decl. Ex. M at USA-007293–USA-007294; PSR ¶ 30.
 7 He criticizes those who have not commented on his own actions and similar criminal conduct: “There
 8 are also places . . . with cop cars flipped and property destruction accompanying quick takeovers with no
 9 arrest, yet no analysis is coming out about those, or link what occurred in Berkeley, with ‘Operation
 10 Campus Flood.’” Bhagat Decl. Ex. M at USA-007294.

11 In another note to a friend, Goonan implored them not to “let anyone forget that more advanced
 12 tactics”—his arsons and firebombings—“were tested in the Bay Area/UCB campus fight for Palestine
 13 than simply pitching tents and hosting teachouts for weeks!” Bhagat Decl. Ex. O at USA-007555. He
 14 then referred them to the blog posts about his crimes. *Id.* What Goonan’s own operation lacked, he
 15 lamented, “was more numbers of participants, lack of preparation, and not enough tact to use the finer
 16 lessons of [Hamas’s] Operation Al-Aqsa Flood.” *Id.* “For instance,” Goonan continued, “in Op Al Aqsa
 17 Flood, the counter-offensive attack began with decoy firing of missiles up the coast toward Tel Aviv—
 18 focusing all Zionist attention there.” *Id.* at USA-007556. The lessons to be drawn from the Hamas
 19 attack that killed 1200 people, Goonan concluded, were to “use decoys, dismantle surveillance where
 20 possible, don’t leave traces, and try to take initiative to catalyze revolt not simply trail uprisings and
 21 movements as they form without us.” *Id.*

22 Goonan is not satisfied with his own actions; he wants to inspire followers. He encourages
 23 others to read his manifestos (what he calls “communiques”). *See, e.g.*, Bhagat Decl. Ex. G. at USA-
 24 007627. He believes that he is engaged in a war, *id.* at USA-007628, and he continually expresses
 25 disgust with those who engaged in peaceful protest. *See, e.g., id.* at USA-007633 (“I also however am
 26 annoyed more generally with the hesitancy of nonstudent community support in college cities to simply
 27 override student’s [sic] planning and just take history into our own hands. We can wait for them, and
 28 trail these protests that in most areas are not actually escalating, or we can be the spark or catalyst (or

1 whatever metaphor you'd like to use) to heighten contradictions and set new levels of insurgency in
 2 motion." He derogatorily calls the activities of peaceful protesters "performative activism" and "partial
 3 solidarity." *Id.* at USA-007629.

4 In a September 2024 letter, Goonan called for "direct attacks on campus infrastructure"
 5 combined with the use of "communiques and statements" to communicate their political demands. *Id.* at
 6 USA-007633. In other words, he called for others to do what he did.

7 **2. Plans to Release Commentary After Sentencing**

8 On several occasions, Goonan has told others that he plans to publish his real thoughts *after* this
 9 Court sentences him. After he was arrested, he wrote to a friend: "Not trying to force anything, I just
 10 don't have a safe way to preserve this stuff and at some point (once its 'safe' to), I'd like to circulate all
 11 this analysis publicly." Bhagat Decl. Ex. I. at USA-0007258 (emphasis added). On February 15, 2025 –
 12 after he pleaded guilty—he urgently asked a friend to transcribe his writings because "[o]n April 24, my
 13 birthday, I plan to share three of my writings from jail publicly on my blog." *See* Bhagat Decl. Ex. P at
 14 USA-007648. Goonan picked April 24 because it was symbolic—his birthday—but also because it was
 15 after his original sentencing date of April 8. *See* Minute Entry, ECF No. 24 (setting sentencing date for
 16 April 8, 2025). In another letter, he was more explicit: "My plan is to publish and begin circulating
 17 some selected letters and writing from my time at Santa Rita on April 17th, the day after my sentencing
 18 hearing, because at that point I'll be able to speak publicly again without consulting lawyers." Bhagat
 19 Decl. Ex. Q at USA-007656. On February 17, 2025, Goonan wrote: "Not sure how much you know
 20 about my case or situation at the moment but once I'm sentenced in April, I'm gonna be releasing some
 21 letters and writings that I wrote while in jail, reflecting on the encampment wave and Campus Flood @
 22 UCB." Bhagat Decl. Ex. R at USA-007662. He warned others not to share his statements because he
 23 wanted to hide his true views from the Court: "P.S. Please do not circulate this online or publicly. It's
 24 okay to share among comrades but i can't make public statements until after my sentencing hearing on
 25 4/8/25." *Id.* at USA-007671. *See also* Bhagat Decl. Ex. S at USA-008180 ("do not make this public,
 26 print or digital, until after my sentencing is over. Safe to say that 6/17, the anniversary of the day of the
 27 raid is a good day, or maybe 6/16...whichever").

28

1 Goonan has worked with others to create a book manuscript, which he intends to publish after
2 sentencing. He has asked individuals to help, and they have transcribed and complied hundreds of pages
3 for the effort. *See* Bhagat Decl. Ex. F at USA-008210–USA-0081211 (noting incoming mail that
4 includes timeline of life and campus flood movements, and single additional mailing containing 230+
5 pages). Goonan has taken an active role in this project, as evidenced by his handwritten notes and his
6 insistence that Goonan took pains to ensure that his attacks on Oakland and the entire East Bay were
7 recognized—not just his conduct in Berkeley. *See* Bhagat Decl. Ex. S at USA-008185. The erstwhile
8 outline and table of contents for that book suggests that it will include, among other things, his blog
9 posts taking responsibility for the June 2024 attacks, a “prisoner of war” statement, an examination of
10 the Al-Aqsa Flood as a paradigm of insurgency, an examination of the University Campus as a “Zone of
11 Combat,” “approaches to decentralized guerilla attack.” *See* Bhagat Decl. Ex. T. In a letter dated
12 November 20, 2024, Goonan shared a bibliography of his writings, including the forthcoming book on
13 the criminal activity for which he is being sentenced. Bhagat Decl. Ex. U at USA-0007515. He
14 implored the recipient: “Do not tell anyone else about this project yet...not even the lawyers . . . I am
15 waiting to see what happens with sentencing before I tell more people about this.” *Id.* “Don’t worry,” he
16 assured the recipient. “I’m going to release this after sentencing, when there is no way it can affect my
17 case.” *Id.* In a subsequent letter, he confirmed to a friend, “I’m putting together a book of it all [his
18 analysis pieces] for release once it can’t affect my sentencing.” Bhagat Decl. Ex. F at USA-008210.
19 Shortly after Goonan learned that the government was in possession of his correspondence, Goonan
20 wrote to warn others, acknowledging that he had been reckless in expressing his true beliefs and
21 expressing apprehension that the Court’s knowledge about them might affect his sentence. *See* Bhagat
22 Decl. Ex. V at USA-007654.

23 **3. Escape Plans**

24 In October 2024, the defendant attempted to send a letter to a person in Philadelphia. In that
25 letter, he criticized those who did not endorse “combative direct action,” Bhagat Decl. Ex. M at USA-
26 007294. Goonan went on to describe, in detail, a plan to take advantage of his medical conditions to
27 escape pretrial custody. *See id.* at USA-007295–USA-007296. He described it as a “comic strip,” but the
28 level of detail, along with the context (at one point, Goonan says he is “gonna leave it there for the

1 imagination”), tends to suggest that it was more of a plan than a comic strip and that Goonan was asking
 2 the recipient for assistance. The jail took it seriously; of all of Goonan’s correspondence that it
 3 intercepted during the course of his pretrial detention, this was the only one that it chose not to send to
 4 the recipient following a review. Bhagat Decl. ¶15.

5 **4. Use of “Legal Mail” to Evade Detection**

6 Like many detention facilities, the Alameda County Sheriff’s Office has a special policy with
 7 regard to inmates’ correspondence with lawyers, courts, and judges—as a general matter, the contents of
 8 such correspondence are not inspected. *See generally* Bhagat Decl. Ex. W at USA-008234. Goonan took
 9 advantage of this policy to evade detection.

10 **(i) Correspondence with D.R.**

11 For example, on July 28, 2024, Goonan sent correspondence to his friend and former professor, a
 12 person who has never practiced law, has no legal training, and does not work at a legal services
 13 provider. *See* Bhagat Decl. Ex. X. In that correspondence, Goonan explained that “on the topic of
 14 narrative warfare and documentary purposes, I want to give you an explanation of what and where my
 15 archives are. I’m doing this for the purposes of preempting the erasure of my life’s work, which is/has
 16 been largely not under my name.” *Id.* at USA-007252. What followed was largely instructions on how
 17 to find Goonan’s writings, and a wish list. Even though the correspondence was not written to a lawyer
 18 and did not seek legal advice, Goonan wrote on the envelope, “Protected/Privileged Legal
 19 Correspondence” and “Legal Council [sic] Confidential Legal Correspondence.” *See id.* at USA-
 20 007251.

21 On August 6, 2024, Goonan sent correspondence to the same person; that correspondence did
 22 not contain a single request for legal advice or a discussion of Goonan’s legal issues. Rather, it was a
 23 13-page litany of Goonan’s complaints, his criticism about “academicism,” and how he resented “far-
 24 right asshats” and “Nazi-brain-programmed Right-wing dorks” that sought to explain his actions without
 25 respecting his autonomy. Despite this, Goonan labeled the correspondence “Legal Mail Protected
 26 Correspondence Legal Council [sic].” Bhagat Decl. Ex. I at USA-007256.

(ii) Correspondence with R.A. and Goonan's Requests to Others to Fraudulently Send Him Activist Material Under the Cover of Legal Mail²

R.A. is a friend of Goonan’s who works at a legal-services organization. Goonan has engaged in substantial communication with R.A. by labeling that correspondence as “legal mail” and “privileged correspondence” and addressing it, in almost every case, to a lawyer who worked at the organization, complete with the attorney’s bar number. Yet, the correspondence was overwhelmingly of a personal nature. *See, e.g.* Bhagat Decl. ¶ 27 & Ex. Y at USA-008217 (July 24, 2024); USA-008219 (Aug. 23, 2024); USA-007636 (Oct. 30, 2024). And the lawyer never authorized R.A. to engage in correspondence using the lawyer’s name or bar number; the lawyer has never met or represented Goonan. *See* Bhagat Decl. Ex. Z.

Moreover, there is substantial evidence that Goonan planned to use his relationship with R.A.—and that person’s employment at a legal-services organization—to facilitate the receipt of information that he did not want jail authorities to see. In a September 2, 2024 phone call, Goonan thanked R.A. for “all the legal mail” that he had been “sharing[] around.” Bhagat Decl. Ex. W at USA-008226. In an October 31, 2024 phone call, Goonan used coded language when speaking to a friend who he had tasked with transcribing his jail writings. He described a process whereby the friend could send him transcriptions via legal mail, “he would make edits and send them back to her, she would get them to ‘the homies’ . . . and she would then resend the book to him [Goonan] via legal mail.” Goonan told the other party that this plan—to transcribe his jail correspondence and publish a book—was “‘under wraps’ and that neither his defense committee nor his lawyers needed to know about it.” *Id.* at USA-008255. Goonan then went on to explain what he meant by legal mail: “Send it to me through legal mail, I’ll show you a person to do it through—I have a person who can do that—I have a friend who is a lawyer and can do that. I’ll connect you with them eventually.” *Id.* at USA-008256.

25 ² The probation officer's decision to omit this information from the PSR because "these
26 communications are the subject of litigation before a United States Magistrate Judge," PSR addendum at
27 1, is misguided. The discrete issue before the Magistrate Judge is the government's request that the
28 Magistrate Judge provide the government with unredacted versions of three of the letters in question,
which were obtained via search warrant; the defendant claims that the redacted portions are privileged.
Regardless of the Court's ultimate resolution on that discrete issue, it is undisputed that Goonan engaged
in this correspondence and at least part of that correspondence was personal in nature. *See, e.g.*, ECF
Nos. 36, 52, 53, 55, 56.

1 On December 5, 2024, Goonan wrote the same person with whom he communicated on October
 2 31 and told her that when she completed her transcriptions, she should “write a short note, telling the
 3 recipient that you are trying to get my book manuscript draft to me safely and securely. They will know
 4 what to do . . . Let them know the timing is urgent.” Bhagat Decl. Ex. AA at USA-007538. Goonan then
 5 instructed the person to send the transcription to the lawyer, complete with the lawyer’s bar number.
 6 *See id.* USA-007539. On November 1, 2024, Goonan wrote to a friend: “I’m receiving a substantial
 7 amount of mail from all over the country, who are sending zines, articles, excerpts, and books that my
 8 lawyers would consider ‘highly sensitive’... Would still like to find a way (maybe via ‘Legal Mail’—
 9 my friend w/ the [legal services organization] could help w/ that) to get ahold of some of the more
 10 prominent or impactful articles, briefs, and content from the counter-info ecosystem published since
 11 June, til present.” Bhagat Decl. Ex. W at USA-008256. In the same letter, Goonan told the recipient to
 12 send “all Print Outs or info to” the lawyer, “for Casey.” *Id.* at USA-008256.

13 **C. Defendant’s Criminal History and Conduct While in Custody**

14 The defendant does not have any prior convictions. But that does not mean that he has never
 15 previously engaged in criminal conduct. In September 2023, he attended a protest near the Hilton hotel
 16 in San Francisco. But rather than peacefully express his views, Goonan took it upon himself to climb
 17 the Hilton sign and attack it with a hammer, causing thousands of dollars in damage. And when police
 18 officers attempted to stop him, he fled. Two officers suffered injuries in the pursuit, including one who
 19 fractured a finger. *See PSR ¶ 55.* He was charged with vandalism and resisting a peace officer causing
 20 serious bodily injury. And on a random day in June 2024, while agents were conducting surveillance on
 21 Goonan, they saw him vandalize a real estate sign in Oakland, unprovoked and for no apparent reason.
 22 PSR ¶ 23.

23 In July 2024, while in custody at the San Francisco County Jail, Goonan banged a telephone
 24 against a wall several times, ignoring orders to stop and eventually causing it to break. He was charged
 25 with causing damage in a jail. PSR ¶ 56. Goonan’s time in federal pretrial custody, too, has not been
 26 without incident. In May 2025, he submitted a grievance against a jail deputy, alleging that the deputy
 27 had threatened him and engaged in a pattern of aggressive behavior. Santa Rita, which remains under
 28 federal monitorship, takes allegations like that very seriously. It conducted a full investigation and

1 concluded that not only were Goonan's allegations without merit, but that he had made them in bad
 2 faith. PSR ¶ 33. And even while still under sanction for this bad faith conduct, in June, he suffered an
 3 additional disciplinary infraction for disrespecting a deputy and causing excessive noise. *Id.*

4 **D. Defendant's Years-Long Advocacy for Political Violence**

5 As set forth above, the defendant is a self-described anarchist. He has publicly claimed
 6 responsibility for the June 2024 attacks and claimed that they were in solidarity with the Palestinian
 7 people and their plight during the Israel-Hamas war. But Goonan had aims of political violence long
 8 before Hamas's attack on Israel and the ensuing conflict. In 2020, Goonan called on others to, among
 9 other things, loot businesses, throw rocks, steal crops, and "shoot cops." PSR ¶ 25. He posted diagrams
 10 on the Internet that described how to make Molotov cocktails. *Id.* Goonan, who at the time was a Ph.D.
 11 student at Northwestern, also endorsed the following: "Gas is cheap. Matches are free. School sucks."
 12 *Id.* To believe that Goonan's actions in the summer of 2024 that brought him before this Court are the
 13 sole result of some sincere-but-misguided attempt to aid an oppressed people is wrong. He has
 14 contemplated political violence (and the use of Molotov cocktails) in other contexts, and long before
 15 Hamas's 2023 attack on Israel.

16 **V. General Deterrence**

17 General deterrence is a particularly important sentencing factor in a case like this, perhaps even
 18 more so at this moment in history. "A conviction and resulting sentence serves more purposes than the
 19 incapacitation, specific deterrence, and rehabilitation of an individual; general deterrence of the serious
 20 crime at issue here is also an important consideration." *United States v. Onuoha*, 820 F.3d 1049, 1056
 21 (9th Cir. 2016). Political violence is endemic. Less than a week ago, a young political activist was
 22 murdered on a college campus. This summer, an assassin killed a Minnesota state lawmaker and her
 23 husband and wounded a state senator, each in their respective homes. On April 13, 2025, an assailant
 24 threw Molotov cocktails at the Pennsylvania governor's mansion while the governor and his family slept
 25 inside. In December 2024, the Chief Executive Officer of a major American health insurance company
 26 was gunned down in midtown Manhattan. In July 2024, within weeks of Goonan's arrest, a major U.S.
 27 presidential candidate was the subject of an assassination attempt during a political rally. Nor is this
 28 District a stranger to such horrors: in 2022, a man broke into the home of the former Speaker of the

1 House in San Francisco, intending to kidnap her, but instead brutally assaulting her spouse. *See United*
2 *States v. Depape*, Case No. 3:22-CR-426-JSC. And in the summer of 2020, an extremist with
3 grievances against the government opened fire on the Oakland federal building, killing one Protective
4 Security Officer and wounding another. *See United States v. Carillo*, Case No. 4:20-CR-265-YGR.

5 Goonan's actions were the height of political violence. He engaged in a weeks-long reign of
6 terror to bring attention to himself and his cause. After each attack, he called upon others to join him
7 (and continues to do so, even after his arrest and guilty plea). The fact that his attacks did not hurt
8 anyone is the result of serendipity, not design. The demands of general deterrence are especially high
9 here, where the crime is not just the destruction of particular property at a particular moment but is in
10 fact a challenge to the rich traditions of peaceful political protest—on college campuses and
11 elsewhere—that undergird our democracy. Individuals who Goonan seeks to inspire by his actions—
12 those who he seeks to have consider him a political prisoner and a “martyr”—must know that following
13 in his footsteps will lead to a lengthy term of imprisonment. “Terrorist activities such as those revealed
14 in this case, even when bombs do not explode, wreak great havoc. They disturb the peace and
15 tranquility of all our citizens, requiring future security measures that are both costly and hobbling to the
16 free spirit of our open democratic society.” *United States v. El-Jassem*, 819 F.Supp.166, 180 (E.D.N.Y.
17 1992). “General deterrence is essential here so that the severe consequences of choosing terrorism are
18 apparent to all who might consider it.” *United States v. Babafemi*, No. 13-cr-0109, 2021 WL 1210313,
19 at *6 (E.D.N.Y. Mar. 31, 2021). The Court’s sentence must be sufficiently severe to deter others from
20 following in Goonan’s footsteps.

21 VI. Specific Deterrence

22 The defendant has shown no remorse for his crimes. In a missive to a friend, he wrote, “Mostly,
23 I’m focused on not stirring up too much chaos while my charges keep getting worse. Once we succeed
24 in getting the ‘terrorism’ enhancements dropped it’ll be a little easier to turn up again.” Bhagat Decl.
25 Ex. H at USA-007505. Goonan’s actions were political by design; his posting of a manifesto after each
26 attack was calculated both to glorify his actions and to recruit additional co-conspirators. He plans to
27 publish a book, and views himself as a “martyr” and a political prisoner. He rejects America’s long
28

1 traditions of peaceful protest and deeply believes that violence is the only answer to achieving his
2 political objectives. Moreover, he is highly educated and a prolific writer; he intends to use those
3 attributes to encourage others, too, to engage in violence to achieve their (and his) ends. And unlike
4 others in his stead who simply inspire others to engage in terrorist acts or fund them, Goonan engaged in
5 those acts himself. He is dangerous. But he is also a smart, rational actor. Any sentence this Court
6 imposes must be severe enough to convince Goonan that committing similar acts after his release from
7 custody is simply not worth the consequences.

8 **VII. The Need for the Sentence to Protect the Public from Further Crimes of the Defendant**

9 As described above, the defendant is not sorry for his crimes; he is proud of them. More so than
10 other defendants, there is a substantial risk that he will seek to continue his efforts when released from
11 custody. Protection of the public requires a substantial term of imprisonment followed by an intensive
12 term of supervised release. The government joins probation in its recommendation of a 15-year term,
13 along with special conditions that are tailored to the defendant's conduct in this case. Those conditions
14 include specific conditions restricting the defendant's computer use and his use of anonymizing services,
15 as well as conditions requiring him to register as an arson offender.

16 As described above, the defendant has engaged in an unusually large amount of correspondence
17 while in pretrial custody. Much of that correspondence is about his use of violence to achieve political
18 ends, and his call to others to join that cause. He has also attempted to take advantage of the restrictions
19 on review of attorney-client material to shield his communications from authorities and law
20 enforcement. At certain institutions, the Bureau of Prisons operates "Communication Management
21 Units" (CMUs). CMUs are not solitary confinement, but rather general population housing units where
22 inmates "ordinarily reside, eat, and participate in all educational, recreational, religious, visiting, unit
23 management, and work programming." 28 C.F.R. § 540.200(b). The CMU's purpose is to provide an
24 environment that "enables staff to more effectively monitor communication between inmates in CMUs
25 and persons in the community." *Id.* § 540.200(c). That may include certain limitations on written and
26 telephone correspondence. *See id.* Given the defendant's conduct while in pretrial custody, assignment
27 to a CMU is appropriate. Like other detention decisions, Goonan's designation is committed to the
28 Bureau of Prisons, but the Court may include such a recommendation in its judgment. The government

1 respectfully requests that the Court do so.

2 **VIII. Conclusion**

3 Casey Goonan is not being prosecuted for expressing his political beliefs. He was not convicted
4 for holding those beliefs. He chose to commit violence in furtherance of those beliefs—not once, not
5 twice, but at least four times. That, the law does not permit, and the Court should hold him accountable
6 for those actions.

7 For the foregoing reasons, the United States respectfully requests that the Court impose a
8 sentence of 188 months in custody, 15 years of supervised release, a \$100 special assessment, and
9 restitution and forfeiture.

10 Dated: September 16, 2025

Respectfully submitted,

11 CRAIG H. MISSAKIAN
12 United States Attorney

13 /s/ Nikhil Bhagat
14 NIKHIL BHAGAT
15 Assistant United States Attorney